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5 Attorney for *Bank of New York Mellon, as
Successor to JPMorgan Chase Bank, Not
Individually But Solely As Trustee for the
Holder of the Bear Stearns ALT-A Trust 2005-1,
Mortgage Pass-Through Certificates Series 2005-1*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 THE BANK OF NEW YORK MELLON
11 F/K/A THE BANK OF NEW YORK AS
12 SUCCESSOR TO JPMORGAN CHASE
13 BANK, NOT INDIVIDUALLY BUT
14 SOLELY AS TRUSTEE FOR THE
15 HOLDERS OF THE BEAR STEARNS ALT-
A TRUST 2005-1, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2005-
1,

16 Plaintiff,

17 vs.

18 PREMIER ONE HOLDINGS INC., a Nevada
19 corporation; YING M. SHIH, an individual;
20 SMM Capital LLC, a Nevada limited liability
company; BIN ZHANG, an individual;
21 AMBER HILLS II HOMEOWNERS'
ASSOCIATION, INC., a Nevada non-profit
corporation; ABSOLUTE COLLECTION
SERVICES LLC, a Nevada limited liability
company; DOE INDIVIDUALS I through X;
22 and ROE CORPORATIONS I through X,
inclusive,

23 Defendants.

Case No.: 2:17-cv-00737-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE
ON DEFENDANTS' MOTION FOR
RELIEF FROM A JUDGMENT AND
REQUEST FOR JUDICIAL NOTICE
OF MOTION FOR RELIEF FROM A
JUDGMENT (ECF NOS.
53 AND 54)**

(FIRST REQUEST)

27 Plaintiff, BANK OF NEW YORK MELLON, AS SUCCESSOR TO JPMORGAN
28 CHASE BANK, NOT INDIVIDUALLY BUT SOLELY AS TRUSTEE FOR THE HOLDER

1 OF THE BEAR STEARNS ALT-A TRUST 2005-1, MORTGAGE PASS-THROUGH
2 CERTIFICATES SERIES 2005-1 (“BNYM”) and Defendants, PREMIER ONE HOLDINGS,
3 INC., SMM CAPITAL LLC, YING SHIH, and BIN ZHANG by and through their respective
4 undersigned counsel of record, hereby stipulate and agree as follows. December 11, 2018 is the
5 current deadline for Plaintiff to respond to Defendants, PREMIER ONE HOLDINGS, INC.,
6 SMM CAPITAL LLC, YING SHIH, and BIN ZHANG’s Motion for Relief From A Judgment
7 and Request for Judicial Notice of Motion for Relief from a Judgment (ECF Nos. 53 and 54,
8 filed November 27, 2018, the “Motions”).

9 The Parties stipulate and agree that Plaintiff has up to and including December 18, 2018
10 to respond to the Motion. The amount of time is requested given the entrance of Plaintiff’s new
11 counsel in the matter and necessary time for review of pleadings and related documents.
12 Further, the parties submit this stipulation in good faith and not for purposes of delay.

13 MORRIS LAW CENTER

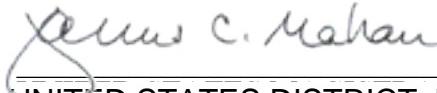
14 /s/ Timothy A. Wiseman, Esq.
15 By: _____
Sarah A. Morris, Esq.
Nevada Bar No. 8461
Timothy A. Wiseman, Esq.
Nevada Bar No. 13768
5450 W. Sahara Ave., Suite 330
Las Vegas, NV 89146
18 Attorneys for *Premier One Holdings, Inc.,*
SMM Capital LLC, Ying Shih, and Bin
Zhang

THE BALL LAW GROUP

16 /s/ Zachary T. Ball, Esq.
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Las Vegas, Nevada 89129
19 Attorney for *Bank of New York Mellon*

20 **ORDER**

21 **IT IS SO ORDERED.**

22 
23 _____
UNITED STATES DISTRICT JUDGE

24 DATED: _____
December 14, 2018
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